

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

[REDACTED])	Case Number: [REDACTED]
)	
<i>Plaintiff,</i>)	
v.)	Judge:
)	Honorable Rebecca R. Pallmeyer
CITY OF CHICAGO, a Municipal Corporation,)	
CHICAGO POLICE DETECTIVE)	
ANTHONY AMATO, STAR NO. 20511,)	Magistrate Judge:
CHICAGO POLICE OFFICER VICTOR)	Honorable Nan R. Nolan
RIVERA, STAR NO. 13011, CHICAGO POLICE)	
OFFICER J. LOPEZ, STAR NO. 809, AND)	
VARIOUS UNKNOWN OFFICERS OF THE)	
CHICAGO POLICE DEPARTMENT,)	
Individually and as an Employee/Agent of the)	
CITY OF CHICAGO, a Municipal Corporation.)	
)	
<i>Defendants.</i>)	

PLAINTIFF'S NOTICE OF ACCEPTANCE OF
DEFENDANTS' OFFER OF JUDGMENT

Pursuant to Rule 68(a) of the Federal Rules of Civil Procedure, Plaintiff, [REDACTED]
[REDACTED] through his undersigned counsel, hereby accepts and provides notice that he has
accepted Defendants' Offer of Judgment to Plaintiff dated June 7, 2012, attached hereto as
Exhibit A and Plaintiff's Acceptance of Defendants' Offer of Judgment is attached hereto as
Exhibit B.

DATED: June 13, 2012

Respectfully submitted,

By: /s/ Vivian Tarver-Varnado
Vivian Tarver-Varnado
HENDERSON ADAM, LLC
330 South Wells Street, Suite 1410
Chicago, Illinois 60606
Phone: (312) 262-2900

Victor P. Henderson
HENDERSON ADAM, LLC
330 South Wells Street, Suite 1410
Chicago, Illinois 60606
Phone: (312) 262-2900

Samuel E. Adam
HENDERSON ADAM, LLC
330 South Wells Street, Suite 1410
Chicago, Illinois 60606
Phone: (312) 262-2900

Attorneys For Plaintiff

CERTIFICATE OF SERVICE

I certify that on June 13, 2012, I caused a true and correct copy of the above and foregoing Notice of Acceptance of Defendants' Offer of Judgment was served by hand-delivery and in accordance with Fed.R.Civ.P. 5, LR 5.5, and the General order on electronic Case filing (ECF), pursuant to the district court's ECF system as to the ECF filers to:

Christopher A. Wallace
Assistant Corporation Counsel
City of Chicago
30 North LaSalle Street, Suite 900
Chicago, IL 60602
Attorney For The City Of Chicago

George J. Yamin, Jr.
Assistant Corporation Counsel
City of Chicago
30 North LaSalle Street, Suite 900
Chicago, IL 60602
Attorney For The City Of Chicago

Nicholas Siefert
Assistant Corporation Counsel
City of Chicago
30 North LaSalle Street, Suite 900
Chicago, IL 60602
Attorney For Defendant Officers

Helen C. Gibbons
Assistant Corporation Counsel
City of Chicago
30 North LaSalle Street, Suite 900
Chicago, IL 60602
Attorney For Defendant Officers

DATED: June 13, 2012

/s/ Vivian Tarver-Varnado
Vivian Tarver-Varnado



of Chicago
 James E. Hynes, Mayor
 Department of Law
 John R. Hynes
 220 North Dearborn
 Chicago, Illinois 60610
 (312) 744-6566
 (312) 744-6566 FAX
 (312) 744-6566 TTY
 www.civilrights.org

FAX COVER SHEET

TO: [REDACTED]

FAX NO.: (312) 262-2901

FROM: NICHOLAS STEFAN

SENDER'S PHONE #: (312) 742-9586

SENDER'S FAX #: 1-312-744-6566
 (Federal Civil Rights Litigation Division)

DATE: 6/7/12

PAGES TO FOLLOW: 4

MESSAGE: AFTER OF JUDGMENT

RE: [REDACTED] V. CTR (12C1557)

IMPORTANT: THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE MAY BE CONFIDENTIAL AND/OR LEGALLY PRIVILEGED INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY COPYING, DISSEMINATION, OR DISTRIBUTION OF CONFIDENTIAL OR PRIVILEGED INFORMATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE IMMEDIATELY NOTIFY THE SENDER BY TELEPHONE NUMBER LISTED ABOVE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE UNITED STATES POSTAL SERVICE.

THANK YOU.

EXHIBIT

C.R.# 1051475 A
 ATTACHMENT 24



City of Chicago
Rahm Emanuel, Mayor

Department of Law

Stephen R. Patton
Corporation Counsel

Nicholas E. Siefert
Assistant Corporation Counsel
Federal Civil Rights Litigation
30 North LaSalle Street
Suite 900
Chicago, Illinois 60602-2580
(312) 744-9586
(312) 744-6566 (FAX)
(312) 744-9104 (TTY)

<http://www.cityofchicago.org>

Via facsimile and hand delivery

June 7, 2012

Victor P. Henderson
Samuel E. Adam
Vivian Tarver-Varnado
Henderson Adam, LLC
330 south Wells Street
Suite 1410
Chicago, IL 60606

Facsimile: (312) 262-2901

Re: [REDACTED] v. *City of Chicago, et al.* (12 C 1557)

Dear Counsel:

Please find enclosed Defendants' Offer of Judgment to Plaintiff.

Sincerely,


Nicholas E. Siefert
Assistant Corporation Counsel



C.R.# 1051475
ATTACHMENT 24

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

[REDACTED])	
)	
Plaintiff.)	No. [REDACTED]
v.)	
)	Judge Pallmeyer
CITY OF CHICAGO, a Municipal Corporation,)	
CHICAGO POLICE DETECTIVE)	
ANTHONY AMATO, STAR NO. 20511,)	Magistrate Judge Nolan
CHICAGO POLICE OFFICER VICTOR)	
RIVERA, STAR NO. 13011, CHICAGO POLICE)	
OFFICER J. LOPEZ, STAR NO. 809, AND)	
VARIOUS UNKNOWN OFFICERS OF THE)	
CITY OF CHICAGO, a Municipal Corporation,)	
Individually and as an Employee/Agent of the)	
CITY OF CHICAGO, a Municipal Corporation,)	
Defendants.)	

OFFER OF JUDGMENT

Defendants City of Chicago, Detective Anthony Amato, Officer Victor Rivera, and Sergeant Jose Lopez, by their respective attorneys, pursuant to Fed. R. Civ. P. 68, make the following offer of judgment to [REDACTED]

1. Defendants offer to allow judgment to be taken against them collectively and in favor of Plaintiff [REDACTED] in the total amount of FIFTY THOUSAND AND ONE AND NO/100 (\$50,001.00) DOLLARS, plus reasonable attorney's fees and costs accrued to the date of this offer in an amount to be determined by the Court.

C.R.# 1051475
ATTACHMENT 24

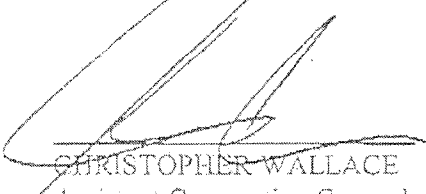
2. This offer of judgment is inclusive of all claims Plaintiff has or may have against Defendants, Detective Anthony Amato, Officer Victor Rivera, Sergeant Jose Lopez, and the City of Chicago, and any other current or former employees or agents of the City of Chicago arising from the incident or injuries alleged in Plaintiff's Amended Complaint or any amendment thereof, including any unnamed officers.

3. This offer of judgment is conditioned upon Plaintiff accepting the offer of judgment as to defendants collectively. Acceptance of this offer of judgment by Plaintiff against fewer than all defendants shall be deemed a rejection of this offer.

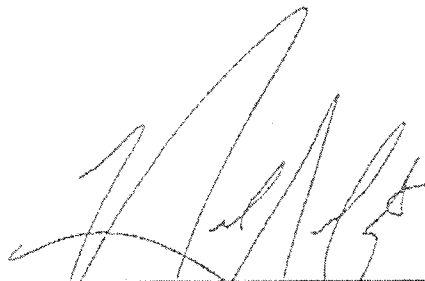
4. Pursuant to Fed. R. Civ. P. 68, an offer not accepted within fourteen (14) days after service of the offer shall be deemed withdrawn and evidence thereof is not admissible except in a proceeding to determine costs.

DATED this 7th day of June, 2012.

Respectfully submitted,



CHRISTOPHER WALLACE
Assistant Corporation Counsel
Attorney for the City
30 N. LaSalle, St. Suite 900
Chicago, Illinois 60602
(312) 742-6408



NICHOLAS SIFERT
Assistant Corporation Counsel
Attorney for Defendant Officers
30 North LaSalle Street, Suite 900
Chicago, IL 60602
(312) 742-9586

DATED: 6/7/12

DATED: 6/7/12

C.R. #1051475
ATTACHMENT 24

CERTIFICATE OF SERVICE

I hereby certify that I have caused a true and correct copy of the above and foregoing
OFFER OF JUDGMENT to be sent via hand-delivery and Facsimile transmission to the
following persons:

Victor P. Henderson
Samuel E. Adam
Vivian Tarver-Varnado
Henderson Adam, LLC
330 South Wells Street
Suite 1410
Chicago, IL 60606
Facsimile: (312) 262-2901

on this 7th day of June, 2012.



NICHOLAS SIEFERT
Assistant Corporation Counsel

Suite 900
30 North LaSalle Street
Chicago, Illinois 60602
(312) 742-9586
Attorney No. 06300866

C.R.# 1051475

ATTACHMENT 24

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

[REDACTED]

Plaintiff,

v.

CITY OF CHICAGO, a Municipal Corporation,
CHICAGO POLICE DETECTIVE
ANTHONY AMATO, STAR NO. 20511,
CHICAGO POLICE OFFICER VICTOR
RIVERA, STAR NO. 13011, CHICAGO POLICE
OFFICER J. LOPEZ, STAR NO. 809, AND
VARIOUS UNKNOWN OFFICERS OF THE
CHICAGO POLICE DEPARTMENT,
Individually and as an Employee/Agent of the
CITY OF CHICAGO, a Municipal Corporation,

Defendants.

Case Number: [REDACTED]

Judge:

Honorable Rebecca R. Pallmeyer

Magistrate Judge:

Honorable Nan R. Nolan

PLAINTIFF'S ACCEPTANCE OF
DEFENDANTS' OFFER OF JUDGMENT

Plaintiff, [REDACTED] by and through his attorneys, Henderson Adam, LLC, accepts the Offer of Judgment tendered by Defendants, City of Chicago, Detective Anthony Amato, Officer Victor Rivera, and Sergeant Jose Lopez, pursuant to Fed. R. Civ. P. 68.

1. Plaintiff, [REDACTED] accepts the offer to allow judgment to be taken against Defendants, City of Chicago, Detective Anthony Amato, Officer Victor Rivera and Sergeant Jose Lopez, and in favor of Plaintiff, [REDACTED] in the total amount of FIFTY THOUSAND AND ONE AND NO/100 (\$50,001.00) DOLLARS, plus reasonable attorney's fees and costs accrued to the date of this offer in an amount to be determined by the Court.

EXHIBIT

B

C.R.# 1051475
ATTACHMENT 24

2. Plaintiff, [REDACTED] acknowledges that acceptance of the Offer of Judgment is inclusive of all claims Plaintiff, [REDACTED] has or may have against Defendants, Detective Anthony Amato, Officer Victor Rivera, Sergeant Jose Lopez, and the City of Chicago, and any other current or former employees or agents of the City of Chicago arising from the incident or injuries alleged in Plaintiff's Amended Complaint or any amendment thereof, including any unnamed officers.

DATED: June 13, 2012

Respectfully submitted,

By: 

Victor P. Henderson
Samuel E. Adam
Vivian Tarver-Varnado
HENDERSON ADAM, LLC
330 South Wells Street, Suite 1410
Chicago, Illinois 60606
Phone: (312) 262-2900

Attorneys For Plaintiff

CERTIFICATE OF SERVICE

I certify that on June 13, 2012, I caused a true and correct copy of the above and foregoing Notice of Acceptance of Defendants' Offer of Judgment was served by hand-delivery to:

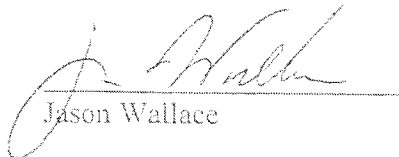
Christopher A. Wallace
Assistant Corporation Counsel
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30 North LaSalle Street, Suite 900
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Attorney For The City Of Chicago

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Assistant Corporation Counsel
City of Chicago
30 North LaSalle Street, Suite 900
Chicago, IL 60602
Attorney For Defendant Officers

Helen C. Gibbons
Assistant Corporation Counsel
City of Chicago
30 North LaSalle Street, Suite 900
Chicago, IL 60602
Attorney For Defendant Officers

DATED: June 13, 2012


Jason Wallace